

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL, SAFETY AND POLLUTION PREVENTION

MAR 1 1 2013

Henry M. Jacoby, agent for IMS Trading, L.L.C. 6010 Wilshire Boulevard, Suite 400 Los Angeles, CA 90036

Subject:

Amendment to add additional product sizes and other information in compliance with the RED

EPA Registration No./Primary Brand Names/

81433-3 81433-4 81433-5 IMS Moth Block IMS Moth Cake

IMS Moth Crystals

Submission Date: February 6, 2013

Dear Mr. Jacoby:

The labels referred to above, submitted under FIFRA, as amended, are <u>acceptable</u>. Please submittone final printed copy for the above mentioned labels before releasing the products for shipment. If you have any questions, please contact Gene Benbow at (703) 347-0235 or via email at <u>benbow.gene@epa.gov</u>.

Sincerely,

John Hebert

Product Manager 07

Insecticide-Rodenticide Branch Registration Division (7505P)

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 1 of 17

Front Panel:

[Smart Living Moth Blocks]
[IMS Moth Block]
[Lavender Scented Moth Block]
[Cedar Scented Moth Block]

Kills Clothes Moths, Eggs, Larvae & Carpet Beetles

No Clinging Odor Protects Clothing

When Used in Air-tight Containers This Product Can Treat Up to 18 cu. ft. (6 oz.)

[6 cu. ft. (2 oz.)]

[9 cu. ft. (3 oz.)]

[10.5 cu. ft. (3.5 oz.)]

[12 cu. ft. (4 oz.)]

[13.5 cu. ft. 4.5 oz.)]

[15 cu. ft. (5 oz.)]

[21 cu. ft. (7 oz.)]

[24 cu. ft. (8 oz.)]

[27 cu. ft. (9 oz.)]

[30 cu. ft. (10 oz.)]

KEEP OUT OF REACH OF CHILDREN.

WARNING:

SEE SIDE AND BACK PANEL FOR ADDT'L PRECAUTIONS

Ingredient Statement:

Active Ingredient:	Paradichlorobenzene	99.5%
Other Ingredients.		0.5%
TOTAL		100.0%

MAR 11 2013

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as arounded, for the pesticide Registered under EPA Reg. No. 81433-3

Net Wt. 6 oz. (Two (2) 3 OZ BLOCKS 170.1g)
[Net Wt. 6 oz. (One (1) 6 OZ BLOCK 170.1g)]
[Net Wt. 2 oz. (One (1) 2 OZ BLOCK 56.7g)]
[Net Wt. 3 oz. (One (1) 3 OZ BLOCK 85.0g)]
[Net Wt. 3.5 oz. (One (1) 3.5 OZ BLOCK 99.2g)]
[Net Wt. 4 oz. (One (1) 4 OZ BLOCK 113.4g)]
[Net Wt. 4.5 oz. (One (1) 4.5 OZ BLOCK 127.6g)]

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 2 of 17

> [Net Wt. 5 oz. (One (1) 5 OZ BLOCK 141.7g)] [Net Wt. 7 oz. (One (1) 7 OZ BLOCK 198.4g)] [Net Wt. 8 oz. (One (1) 8 OZ BLOCK 226.8g)] [Net Wt. 9 oz. (One (1) 9 OZ BLOCK 255.1g)] [Net Wt. 10 oz. (One (1) 10 OZ BLOCK 283.5g)]

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 3 of 17

Immediate Left Panel:

[Protect in winter and summer and spring and fall.]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS, EGGS, LARVAE, AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (eggs, larvae, and adults) and carpet beetles in clean, air-tight containers, garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics, silks, blended fabric, and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Remove cellophane from the product and hang/apply product in clean, air-tight containers, bags, and closets listed above at the following rates:

- [1 (2 oz.) block for each 6 cubic feet]
- [1 (3 oz.) block for each 9 cubic feet]
- [1 (3.5 oz.) block for each 10.5 cubic feet]
- [1 (4 oz.) block for each 12 cubic feet]
- [1 (4.5 oz.) block for each 13.5 cubic feet]
- [1 (5 oz.) block for each 15 cubic feet]
- [1 (6 oz.) block for each 18 cubic feet]
- [1 (7 oz.) block for each 21 cubic feet]
- [1 (8 oz.) block for each 24 cubic feet]
- [1 (9 oz.) block for each 27 cubic feet]
- [1 (10 oz.) block for each 30 cubic feet]

To determine the ounces of product needed, multiply the height, width, and depth of the treated space (measured in feet) and divide by 3. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep is 96 cubic feet, divided by 3 ft³/oz. of product, equals 32 oz. of product needed to adequately treat the area.

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 4 of 17

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets two (2) times a year.

To Freshen Closets: Just hang in closet after removing all of the cellophane. Pleasant odor quickly vanishes when articles are aired.

Do not use in plastic storage box or place in contact with plastic items as paradichlorobenzene damages some plastics. Paradichlorobenzene must not be mixed or placed in contact with other moth preventive chemicals.

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 5 of 17

Left Panel:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available, or place in trash.

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 81433-3 EPA Est. 81217-CHN-001

Made in China

[Sold by:]/[Distributed by:] [Name and address as appropriate] Manufactured by: IMS Trading, LLC, Los Angeles, CA

Batch	Number:	

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 6 of 17

Back Panel:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING: Causes substantial but temporary eye injury, skin, and respiratory tract irritation. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear protective eyewear. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

DYDCE A VD		
	FIRST AID	
If Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice. 	
If on Skin or Clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 	
If In Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. 	
If Swallowed	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person. 	
HOTLINE NUMBER		
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.		
	NOTE TO PHYSICIAN	
Possible mucosal d	lamage may contraindicate the use of gastric lavage.	

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 7 of 17

SUB-LABEL FOR METAL HANGERS

Front Panel:

[Smart Living Moth Blocks] [IMS Moth Block with Hanger] [Lavender Scented Moth Block] [Cedar Scented Moth Block]

Kills Clothes Moths, Eggs, Larvae & Carpet Beetles

No Clinging Odor Protects Clothing

When Used in Air-tight Containers
This Product Can Treat Up to 18 cu. ft. (6 oz.)

[9 cu. ft. (3 oz.)]

[10.5 cu. ft. (3.5 oz.)]

[12 cu. ft. (4 oz.)]

[13.5 cu. ft. (4.5 oz.)]

[15 cu. ft. (5 oz.)]

[21 cu. ft. (7 oz.)]

[24 cu. ft. (8 oz.)]

[27 cu. ft. (9 oz.)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: SEE SIDE AND BACK PANEL FOR ADDT'L PRECAUTIONS

> Net Wt. 3 oz. (One (1) 3 OZ BLOCK 85.0g) [Net Wt. 3.5 oz. (One (1) 3.5 OZ BLOCK 99.2g)] [Net Wt. 4 oz. (One (1) 4 OZ BLOCK 113.4g)]

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 8 of 17

[Net Wt. 4.5 oz. (One (1) 4.5 OZ BLOCK 127.6g)]
[Net Wt. 5 oz. (One (1) 5 OZ BLOCK 141.7g)]
[Net Wt. 6 oz. (Two (2) 3 OZ BLOCKS 170.1g)]
[Net Wt. 6 oz. (One (1) 6 OZ BLOCK 170.1g)]
[Net Wt. 7 oz. (One (1) 7 OZ BLOCK 198.4g)]
[Net Wt. 8 oz. (One (1) 8 OZ BLOCK 226.8g)]
[Net Wt. 9 oz. (One (1) 9 OZ BLOCK 255.1g)]

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 9 of 17

SUB-LABEL FOR METAL HANGERS

Immediate Left Panel:

[Protect in winter and summer and spring and fall.]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS, EGGS, LARVAE, AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (eggs, larvae, and adults) and carpet beetles in clean, air-tight containers, garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics, silks, blended fabric, and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags, and closets listed above at the following rates:

- [1 (3 oz.) block for each 9 cubic feet]
- [1 (3.5 oz.) block for each 10.5 cubic feet]
- [1 (4 oz.) block for each 12 cubic feet]
- [1 (4.5 oz.) block for each 13.5 cubic feet]
- [1 (5 oz.) block for each 15 cubic feet]
- [1 (6 oz.) block for each 18 cubic feet]
- [1 (7 oz.) block for each 21 cubic feet]
- [1 (8 oz.) block for each 24 cubic feet]
- [1 (9 oz.) block for each 27 cubic feet]

To determine the ounces of product needed, multiply the height, width, and depth of the treated space (measured in feet) and divide by 3. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep is 96 cubic feet, divided by 3 ft³/oz. of product, equals 32 oz. of product needed to adequately treat the area.

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets two (2) times a year.

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 10 of 17

To Freshen Closets: Just hang in closet after removing all of the cellophane. Pleasant odor quickly vanishes when articles are aired.

Do not place in contact with plastic items as paradichlorobenzene damages some plastics. Paradichlorobenzene must not be mixed or placed in contact with other moth preventive chemicals.

SUB-LABEL FOR METAL HANGERS

Left Panel:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not refill or reuse empty box or cellophane. Offer for recycling, if available, or place in trash.

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 81433-3 EPA Est. 81217-CHN-001

Made in China

[Sold by:]/[Distributed by:] [Name and address as appropriate] Manufactured by: IMS Trading, LLC, Los Angeles, CA

Batch Number:

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 11 of 17

SUB-LABEL FOR METAL HANGERS

Back Panel:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING: Causes substantial but temporary eye injury, skin, and respiratory tract irritation. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear protective eyewear. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

	FIRST AID
If Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If In Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If Swallowed	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
	HOTLINE NUMBER
going for treatmen	container or label with you when calling a poison control center or doctor, or at. You may also contact the National Pesticide Information Center (NPIC) for emergency medical treatment information.
	NOTE TO PHYSICIAN
Possible mucosal of	damage may contraindicate the use of gastric lavage.

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 12 of 17

SUB-LABEL FOR PEEL OFF LABEL

Front Panel:

Peel here to remove.

[Smart Living Moth Blocks]
[IMS Moth Block]
[Lavender Scented Moth Block]
[Cedar Scented Moth Block]

Kills Clothes Moths, Eggs, Larvae & Carpet Beetles

No Clinging Odor Protects Clothing

When Used in Air-tight Containers
This Product Can Treat Up to 6 cu. ft. (2 oz.)

[9 cu. ft. (3 oz.)]

[15 cu. ft. (5 oz.)]

[21 cu. ft. (7 oz.)]

[24 cu. ft. (8 oz.)]

[30 cu. ft. (10 oz.)]

KEEP OUT OF REACH OF CHILDREN.

WARNING: SEE SIDE AND BACK PANEL FOR ADDT'L PRECAUTIONS

Ingredient Statement:

Active Ingredient:	Paradichlorobenzene	99.5%
Other Ingredients.	***************************************	0.5%
TOTAL		100.0%

Net Wt. 2 oz. (One (1) 2 OZ BLOCK 56.7g) [Net Wt. 3 oz. (One (1) 3 OZ BLOCK 85.0g)] [Net Wt. 5 oz. (One (1) 5 OZ BLOCK 141.7g)] [Net Wt. 6 oz. (One (1) 6 OZ BLOCK 170.0g)] [Net Wt. 6 oz. (One (2) 3 OZ BLOCKS 170.0g)] [Net Wt. 7 oz. (One (1) 7 OZ BLOCK 198.4g)] Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 13 of 17

> [Net Wt. 8 oz. (One (1) 8 OZ BLOCK 226.8g)] [Net Wt. 10 oz. (One (1) 10 OZ BLOCK 283.5g)]

15/18

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 14 of 17

SUB-LABEL FOR PEEL OFF LABEL

Immediate Left Panel:

Peel here to remove.

[Protect in winter and summer and spring and fall.]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO KILL CLOTHES MOTHS, EGGS, LARVAE, AND CARPET BEETLES

IMPORTANT: Keep out of reach of children. Do not place in areas accessible to children.

Use Restrictions: To kill clothes moths (eggs, larvae, and adults) and carpet beetles in clean, air-tight containers, garment bags, and storage closets. Do not use in containers, dry cleaning and garbage bags, or closets that allow vapors to escape into occupied rooms. Do not use this product with any other moth control chemical. Do not use in plastic storage containers or in contact with plastic items as paradichlorobenzene damages some plastics. For use only on cloth containing wool or wool blends in fabrics, silks, blended fabric, and furs.

Pre-Application Directions: Before storing, dry clean, wash or brush articles to be protected.

Application Directions: Apply product in clean, air-tight containers, bags, and closets listed above at the following rates:

- [1 (2 oz.) block for each 6 cubic feet]
- [1 (3 oz.) block for each 9 cubic feet]
- [1 (5 oz.) block for each 15 cubic feet]
- [1 (7 oz.) block for each 21 cubic feet]
- [1 (8 oz.) block for each 24 cubic feet]
- [1 (10 oz.) block for each 30 cubic feet]

To determine the ounces of product needed, multiply the height, width, and depth of the treated space (measured in feet) and divide by 3. For example, a closet 8 feet high, 4 feet wide, and 3 feet deep is 96 cubic feet, divided by 3 ft³/oz. of product, equals 32 oz. of product needed to adequately treat the area.

Post-Application Directions: Keep product in air-tight space for a minimum of seven (7) days. Odor dissipates when treated articles are aired.

Retreatment: Since moths are active all year, replenish air-tight containers, bags, and closets two (2) times a year.

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 15 of 17

To Freshen Closets: Just hang in closet after removing all of the cellophane. Pleasant odor quickly vanishes when articles are aired.

Do not place in contact with plastic items as paradichlorobenzene damages some plastics. Paradichlorobenzene must not be mixed or placed in contact with other moth preventive chemicals.

17/18

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 16 of 17

SUB-LABEL FOR PEEL OFF LABEL

Left Panel:

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store only in original container in a cool, dry place inaccessible to children and pets. Keep container closed and away from other chemicals.

Pesticide Disposal and Container Handling: Non-refillable container. Do not reuse empty box or cellophane. Offer for recycling, if available, or place in trash..

If Empty: Place in trash or offer for recycling, if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 81433-3 EPA Est. 81217-CHN-001

Made in China

[Sold by:]/[Distributed by:] [Name and address as appropriate] Manufactured by: IMS Trading, LLC, Los Angeles, CA

Batch Number:	

Master Label for EPA Reg. No. 81433-3 Revised sizes and label revision [Alternate Language Enclosed in Brackets] Revision: February 28, 2013 Page 17 of 17

SUB-LABEL FOR PEEL OFF LABEL

Back Panel:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals.

WARNING: Causes substantial but temporary eye injury, skin, and respiratory tract irritation. Harmful if swallowed or absorbed through skin. Causes eye, skin, and respiratory irritation. Wear protective eyewear. Do not get in eyes or on clothing. Avoid contact with skin. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

NOTICE: California has determined that a chemical contained in this product causes cancer based on tests performed on laboratory animals.

	FIRST AID
If Inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
If on Skin or Clothing	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If In Eyes	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If Swallowed	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
	HOTLINE NUMBER
going for treatment	ontainer or label with you when calling a poison control center or doctor, or t. You may also contact the National Pesticide Information Center (NPIC) for emergency medical treatment information.
	NOTE TO PHYSICIAN
Possible mucosal d	amage may contraindicate the use of gastric lavage.